

Scheyer & Stern, LLC

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July 3, 2019

VIA ECF

Honorable Cheryl L. Pollak, USMJ
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Toussie v. Allstate Insurance Co.
Case No. 1:15-cv-5235 (ARR) (CLP)

Dear Judge Pollack:

I represent plaintiff Robert Toussie and I write as a follow up to Your Honor's docket text Order, dated July 2, 2019, directing both plaintiffs "to produce their tax returns for the years, 2012, 2013, 2014 and 2015 to the Court for *in camera* review by 7/12/19." Counsel for plaintiff Laura Toussie joins me in this letter.

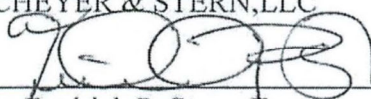
Mr. and Mrs. Toussie are both greatly concerned about the privacy of their tax returns. For that reason, and in accordance with Your Honor's July 2 Order, they have asked if the following procedure would be acceptable to Your Honor.

On a morning you direct, I will accompany Mr. Toussie to your courtroom, and Mr. Toussie will deliver the tax returns to your courtroom clerk. Mr. Toussie will wait in the courtroom (or wait nearby, and be available by cell phone) --- all day if necessary --- until the tax returns are returned to him, following your *in camera* review. We respectfully request one of the following days for such review: July 9, 10, 11 or 12 (with our preference being July 9 or July 12).

I also respectfully request that Chambers not retain copies of the returns following the *in camera* review, and that if the Court determines, following such review, that any of the returns, or portions of any of the returns, should be produced to Allstate, that such direction take the form of an Order that will preserve plaintiffs' appeal rights.

Thank you for your consideration and attention.

Respectfully,
SCHEYER & STERN, LLC

A handwritten signature in black ink, appearing to read 'Fredrick P. Stern', written over a horizontal line.

By: Fredrick P. Stern, Esq.
Attorney for Plaintiff, Robert Toussie

HAMBURGER, MAXSON, YAFFE
& McNALLY, LLC

A handwritten signature in blue ink, appearing to read 'Richard Hamburger', written over a horizontal line.

Richard Hamburger, Esq.
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